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ADMINISTRATIVE AND ENVIRONMENTAL LAW

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December 5, 2018

**Via SCPSC E-FILING DMS**

Jocelyn G. Boyd, Esq.  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, SC 29210

Re: Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas Company  
Docket No. 2019-2-E

Dear Ms. Boyd:

Please find attached for filing the *Petition to Intervene of CMC Steel South Carolina* in the above-referenced matter. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact me if you have any questions concerning this filing.

Sincerely,



Alexander G. Shissias  
S.C. Bar # 11610  
The Shissias Law Firm, LLC  
1727 Hampton Street  
Columbia, SC 29201  
[alex@shissiaslawfirm.com](mailto:alex@shissiaslawfirm.com)

*Local Counsel for CMC Steel South Carolina*

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

IN RE: Annual Review of Base Rates for )	
Fuel Costs for South Carolina Electric & Gas )	Docket No. 2019-2-E
Company )	

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**PETITION TO INTERVENE OF  
CMC STEEL SOUTH CAROLINA**

CMC Steel South Carolina (“CMC”) hereby petitions to intervene as a party of record in the above-captioned proceeding. CMC states the following grounds in support of its petition.

1) CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This facility utilizes an electric arc furnace (“EAF”) to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from South Carolina Electric & Gas Company (“SCE&G”) at a cost of millions of dollars per year. Because the cost of electricity is one of the major costs of steel-making utilizing an EAF, the cost of electricity directly affects CMC’s ability to produce steel at a competitive price. CMC is one of the largest retail customers of SCE&G.

2) Due to the magnitude and unique characteristics of its load, CMC cannot be adequately represented by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.

3) CMC’s mailing address is:

CMC Steel South Carolina  
310 New State Road  
Cayce, SC 29033

4) Mr. Shissias is authorized to accept service of papers in this proceeding on behalf of CMC. CMC also respectfully requests that Damon E. Xenopoulos be added jointly to the

service list as CMC may seek Mr. Xenopoulos's admission to appear before the Commission *pro hac vice* in this docket. Mr. Xenopoulos's address is:

Damon E. Xenopoulos  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson Street, N.W.  
Suite 800 West  
Washington, DC 20007  
(202) 342-0800  
Email: dex@smxblaw.com

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted,



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*Local Counsel for CMC Steel South Carolina*

Dated: December 5, 2018

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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Jenny R. Pittman  
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*Local Counsel for CMC Steel South Carolina*

Dated: December 5, 2018